

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

|   |   |                                 |
|---|---|---------------------------------|
| Elizabeth HUNTER; et al., on behalf of        | ) |                                 |
| themselves and all others similarly situated, | ) |                                 |
|   | ) | Civil Action No. 6:21-cv-00474- |
| Plaintiffs,                                   | ) | AA                              |
| v.  | ) |                                 |
|   | ) | <b>DECLARATION OF</b>           |
| U.S. DEPARTMENT OF EDUCATION and              | ) | <b>BROOKE C.</b>                |
| Suzanne GOLDBERG, in her official capacity as | ) |                                 |
| Acting Assistant Secretary for Civil Rights,  | ) |                                 |
| U.S. Department of Education,                 | ) |                                 |
|   | ) |                                 |
| Defendants.                                   | ) |                                 |

I, Brooke C., declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am using a pseudonym as I fear for my safety and expect retaliation from my school, including disciplinary action and expulsion, if my true identity were known.
3. I am a current student at Cedarville University in Cedarville, Ohio.
4. The university, which has around 4,000 students, dominates the village of Cedarville.
5. I decided to attend Cedarville University because it had a Christian focus, I knew another student who loved it there, and Cedarville offered an accredited professional program I was interested in.
6. I felt relatively comfortable applying to Cedarville at the time, because I still perceived myself as straight at the time. I also didn't fully understand the oppressive nature of the school I was getting involved with until it was too late. Since then, I have been primarily focused on finishing my degree and getting out.
7. I received student loans from the U.S. Department of Education to attend Cedarville University. I will have to repay these loans upon graduation. I also received scholarships to attend.
8. I work two different jobs on campus.
9. I am also a federal income taxpayer.
10. I am demisexual, which means that I only feel sexually attracted to someone when I have an emotional bond with them.

11. I am also pansexual, which means that I am romantically and sexually attracted towards people regardless of their sex or gender identity.
12. I am a cisgender woman, which means that I identify as female and was also assigned the female sex at birth.
13. I am in a long-term relationship with a partner who is non-binary.
14. Cedarville University's Undergraduate Student Handbook contains a section titled "Commitment to Purity", which outlines expected conduct when it comes to sexual relationships.
15. In this section, Cedarville University states "We believe that God's design at Creation for sexual desire and orientation is within the bounds of a marriage union between a man and a woman."
16. This statement feels like an attack and a restriction on who we are allowed to love. Many of us who read this statement feel their hearts sink and marginalized by these statements.
17. The student handbook goes on to say: "Consistent with our desire to teach and model a biblical approach to sex, the University prohibits same-sex dating behaviors and public advocacy for the position that sex outside of a biblically defined marriage is morally acceptable."
18. The prohibition on same-sex dating behaviors makes me feel uneasy, even if my relationship does not technically violate the rules. The language appears designed to be vague enough to get students into trouble while missing a lot of nuance of gender and sexuality.
19. The prohibition on advocacy in favor of anything other than heterosexual relationships creates a chilling effect on discussions of sexuality and gender.
20. One of the clubs on campus often communicates homophobic and racist messages and remains approved by Cedarville. Other clubs that wish to counter these messages are disallowed on campus.
21. Even being discovered to have brought a book written by a queer-affirming author on campus would get me in trouble and monitored.
22. The handbook also states, "Consistent with our commitment to God's design for gender identity, the public advocacy for, or act of altering one's birth identity through medical transition or transgender expression is prohibited. This commitment applies to – but is not limited to – the use of bathrooms, locker rooms, student housing, and participating in gender-specific University groups, clubs, and organizations."
23. I feel completely unsafe being out on campus and have only confided in a few very trusted friends. Students are kicked out for even minor student handbook infractions. Cedarville has been known to dismiss students for anything that they deem a variant from

their "biblical" perspective of gender, marriage, and sexuality. For example, at or around the time I started at Cedarville, a gay student was dismissed by Cedarville for coming out and was asking other students for help so that he could plead his case with the university.

24. Consequently, I fear that I will be dismissed and lose my degree if I am outed. I will also be ostracized by peers, faculty and administrators if I come out. Ⓢ
25. Although I do know several other queer students, many of them struggle to accept themselves and their gender/sexuality and often view their queerness as a problem that needs fixing. Cedarville reinforces this harmful message.
26. There is no support group, campus club or other support system for queer and trans student at Cedarville. There are no queer or trans professors or administrators, at least none who are out publicly about their identities. This creates a very isolating environment for queer and trans students.
27. With all of this in mind, I and many of my close friends are resigned to living our lives in secrecy and silence as we are mocked and degraded publicly in daily chapels and quietly threatened with dismissal.
28. I am told bluntly in classes and chapel that I am unnatural, inherently bad, and deserving of eternal damnation because of who God made me.
29. In my clinical rotations for my degree, we have been taught to misgender and deadname transgender clients and patients and to give prospective employers false assurances of our ability to serve LGBTQ+ clients and patients.
30. My school's policies on sexual orientation and gender identity make me feel sick and scared.
31. Every day on campus is one of secrecy and anxiety.
32. Although remaining closeted has protected me in some ways, I have developed severe anxiety and depression in my time at Cedarville. I have never felt safe enough to come out and I spend many of my days on campus terrified about the possibility of losing my degree if I were to be outed.
33. Cedarville University requested and received a religious exemption from Title IX from the U.S. Department of Education that purportedly allows it to receive federal taxpayer money and to openly discriminate against queer and trans students. This religious exemption provides cover for Cedarville University as it continues to maintain the discriminatory policies and unsafe campus climate that has directly contributed to my pain and suffering.
34. I have gone through many hours of therapy trying to undo the impact that Cedarville's destructive rhetoric and policies have had on me. I have grown and healed a lot through

supportive therapy but my healing would be more complete and easier to come by if I did not have to endure Cedarville's harmful messages or continue to live my life in secrecy and fear.

35. Recently, Cedarville hired a professor with a known history of sexual misconduct. This professor was one of my professors.
36. Eventually, the sexual misconduct was brought to light to students and it was made known that the university was aware of the sexual misconduct at the time of hiring.
37. In response, students have spoken up publicly about how Cedarville has relied on religious exemptions to Title IX to dismiss their sexual assault and harassment complaints.
38. Students have been dismissed or reprimanded by Cedarville when bringing Title IX complaints of sexual assault or sexual harassment because Cedarville considers them to have violated school policy by engaging in sexual activity or consuming alcohol.
39. If I were to be assaulted on campus, I would not feel safe reporting it to Cedarville because of their religious exemption to Title IX, "purity" policies and anti-queer policies.
40. I also worry that even if I make it through these rough years at Cedarville, I will always have my degree associated with an institution that has and will continue to oppress me and many others for who we are.
41. I am taking the risk of sharing my experience in order to protect and honor all of the queer kids that have come before us and who will follow after us. We are deserving of safety and freedom and our liberation is worth fighting tooth and nail for.
42. I know that there is a large community of queer and trans alumni from Cedarville University called Cedarville Out. I look forward to fully joining their community when I am free to do so.
43. Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 7<sup>th</sup> day of February, 2021.

By: Brooke C.  
Brooke C.